

**To:** Jones, Margaret[jones.margaret@epa.gov]; Villanueva, Philip[Villanueva.Philip@epa.gov]  
**Cc:** Nesci, Kimberly[Nesci.Kimberly@epa.gov]; Steeger, Thomas[Steeger.Thomas@epa.gov]; Grable, Melissa[Grable.Melissa@epa.gov]  
**From:** Pease, Anita  
**Sent:** Tue 4/18/2017 11:58:38 AM  
**Subject:** Re: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Hi Margaret,

Until such time when we are able to fully address the potential risks of pesticides to the RPBB, I would recommend that the relevant state's MP3s adopt the voluntary conservation measures specified in the FWS Guidance on RPBB ESA Implementation. It's also worth noting that FWS intends to address the RPBB in its upcoming draft Biological Opinions for chlorpyrifos, diazinon, and malathion - likely due to be released early this summer. Any mitigation measures specific to the RPBB for these chemicals would be implemented once the Biological Opinion is finalized in December 2017.

Thanks,

Anita

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**From:** Jones, Margaret  
**Sent:** Monday, April 17, 2017 5:09:34 PM  
**To:** Villanueva, Philip; Pease, Anita  
**Cc:** Nesci, Kimberly; Steeger, Thomas; Grable, Melissa  
**Subject:** RE: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Hello Philip and Anita,

I'm following up on my request from late March to let you know when we need a response. We would like to provide an update on the RPBB listing for our states in **early May (May 10-11)** during the Region 5 pre-SFIREG meeting.

Since sending the request below, Michigan has released their draft MP3 for public comment. Comments are due by **June 1** and the Michigan Department of Agriculture, Trade and Consumer Protection would like to include some recommendations for protecting the RPBB in their MP3. Would some of the steps recommended in the **RPBB Voluntary Implementation Guidance**, dated March 21, 2017, be appropriate for EPA to recommend as we currently do not have ESPP Bulletins? For example, on page 16-17 there are some recommendations on how to address pesticide use.

Michigan's draft Managed Pollinator Protection Plan:

<https://pollinators.msu.edu/protection-plan/>

USFWS RPBB Guidance on Endangered Species Act Implementation:

<https://www.fws.gov/midwest/endangered/insects/rpbb/guidance.html#map>

I've copied Melissa, who responded some time back to a request from Ohio for similar information on how to protect the RPBB from pesticide exposure at the time the listing was proposed. (See email to me dated October 24, 2016).

Please let me know if you have any questions.

Thank you.

Margaret

**PLEASE THINK CAREFULLY BEFORE PRINTING.**

Margaret L. Jones

Pesticides Section

Chemicals Management Branch

Land and Chemicals Division

US EPA Region 5

77 West Jackson Boulevard

LC-17J

Chicago, IL 60604

312.353.5790 (phone)

312.408.2211 (fax)

jones.margaret@epa.gov

www.epa.gov/pesticides

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**From:** Villanueva, Philip  
**Sent:** Wednesday, March 29, 2017 6:41 AM  
**To:** Jones, Margaret <jones.margaret@epa.gov>  
**Cc:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Pease, Anita <Pease.Anita@epa.gov>  
**Subject:** RE: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Thank you Margaret, we'll get back to you with responses.

Phil

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Philip Villanueva, Chief  
Environmental Information Support Branch  
Environmental Fate and Effects Division  
Office of Pesticide Programs, U.S. EPA  
1200 Pennsylvania Avenue, NW (7507P)  
Washington, DC 20460  
phone: (703) 308-8665  
mobile: (571) 319-3318  
fax: (703) 305-0204  
e-mail: [villanueva.philip@epa.gov](mailto:villanueva.philip@epa.gov)  
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**From:** Jones, Margaret  
**Sent:** 3/27/2017 6:42 PM  
**To:** Villanueva, Philip  
**Cc:** Nesci, Kimberly; Echeverria, Marietta  
**Subject:** FW: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Hello Phillip,

I'm forwarding this message to you per Anita's out of office message.

Thank you.

Margaret

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Margaret L. Jones

Pesticides Section

Chemicals Management Branch

Land and Chemicals Division

US EPA Region 5

77 West Jackson Boulevard

LC-17J

Chicago, IL 60604

312.353.5790 (phone)

312.408.2211 (fax)

[jones.margaret@epa.gov](mailto:jones.margaret@epa.gov)

[www.epa.gov/pesticides](http://www.epa.gov/pesticides)

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**From:** Jones, Margaret

**Sent:** Monday, March 27, 2017 5:40 PM

**To:** Pease, Anita <[Pease.Anita@epa.gov](mailto:Pease.Anita@epa.gov)>; Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>

**Cc:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>; Laws, Meredith <[Laws.Meredith@epa.gov](mailto:Laws.Meredith@epa.gov)>; Steeger, Thomas <[Steeger.Thomas@epa.gov](mailto:Steeger.Thomas@epa.gov)>; Calvo, Estrella <[calvo.estrella@epa.gov](mailto:calvo.estrella@epa.gov)>; Wilkinson, Bruce <[wilkinson.bruce@epa.gov](mailto:wilkinson.bruce@epa.gov)>

**Subject:** FW: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Hello Kimberly and Marietta,

Would you be able to respond to Michigan's concerns? They have two questions: (1) one is about RPBB listing, pesticide labels and their pollinator protection plan (2) the other one is about commercial bumble bee escape into the wild.

(1) Michigan is in the process of completing their MP3 and would like to know how to address the RPBB in the Plan, as it is now a listed endangered species (historical range included Michigan). A Recovery Plan is in progress. Are there BMPs or other recommendations that EPA could provide Michigan for its MP3?

(2) Michigan also referenced the *Rusty Patched Bumble Bee Voluntary Implementation Guidance for Section 10(a)(1)(B) of the ESA*, which recommends not releasing commercial bumble bees into the wild in the RPBB range. Michigan has one of the only producers of Commercial Bumble Bees (Koppert Biological). Can EPA respond to the FWS recommendation about commercial bumble bees, or provide any insights, contacts for follow-up or other information? For example, US FWS recommends use of commercial bumble bees only in greenhouses or "similar".

I've asked when the information is needed and will let you know.

Please let me know if there is anyone else I need to contact.

Thanks,

Margaret

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Pesticides Section

Chemicals Management Branch

Land and Chemicals Division

US EPA Region 5

77 West Jackson Boulevard

LC-17J

Chicago, IL 60604

312.353.5790 (phone)

312.408.2211 (fax)

[jones.margaret@epa.gov](mailto:jones.margaret@epa.gov)

[www.epa.gov/pesticides](http://www.epa.gov/pesticides)

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**From:** Hansen, Michael (MDARD) [<mailto:hansenmg@michigan.gov>]  
**Sent:** Monday, March 27, 2017 10:43 AM  
**To:** Jones, Margaret <[jones.margaret@epa.gov](mailto:jones.margaret@epa.gov)>  
**Cc:** Zimmer, Jeffrey (MDARD) <[zimmerj@michigan.gov](mailto:zimmerj@michigan.gov)>; Stoliecki, Michael (MDARD) <[StolieckiM1@michigan.gov](mailto:StolieckiM1@michigan.gov)>  
**Subject:** FW: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Hello Margaret,

Jeff passed along this US FWS document related to the Rusty Patched Bumble Bee listing for endangered species. I have a couple questions that I'm hoping you can help with.

1. How does the EPA plan to respond to this new Endangered Species listing? There are several ways that EPA has responded to these listings, and those range from increasing awareness to Label Changes EPA felt necessary to achieve protection of an endangered species.

Within the FWS guidelines, there is a recommendation to not allow commercial bumble bees to escape into the wild.

2. Is EPA inclined in any way to support this guideline?

In North America there are only two producers of Commercial Bumble Bees:

Koppert Biological, with facilities in Michigan and Mexico.

BioBest, with facilities in Ontario.

Both produce the eastern bumble bee *Bombus impatiens* for distribution within the *B impatiens* range (East of the Rockies). In some cases, under permit, California has allowed the import of *B impatiens* for greenhouse use, but under strict guidelines to prevent escape. (queen excluders and the required destruction by drowning after pollination.)

Both companies are in the process of developing lines of Western bumble bees to meet the demands of western markets.

Bee diseases are a major concern for the economical production of bumble bees. As a result, testing and quality control is the rule for these businesses, commercial bumble bees fit a number of important pollination niches. Michigan's firm, Koppert Biological has taken positive steps to ensure quality and disease freedom of their stock.

**From:** Zimmer, Jeffrey (MDARD)  
**Sent:** Thursday, March 23, 2017 9:43 AM  
**To:** Hansen, Michael (MDARD) <[hansenmg@michigan.gov](mailto:hansenmg@michigan.gov)>  
**Subject:** RE: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Thanks, Mike. You probably saw this earlier, but this document recommends not releasing commercial bumble bees into the wild in the RPB's range after use and to use them only in greenhouses or similar situations:  
<https://www.fws.gov/midwest/endangered/insects/rpbb/pdf/10a1BGuidanceRPBB21March2017.pdf>.

If you have a chance, would you ask Margaret if pesticide labeling is going change to include ES protections regarding this species? If so, I can see a wide-ranging effect, and maybe we should mention it in our MP3's pesticide section, even if it's not a managed pollinator.

Mike Parker might be interested in this before the DNR's upcoming summit. I'm guessing he'll get pesticide-use questions.

Jeffrey Zimmer, Deputy Division Director

Michigan Department of Agriculture and Rural Development

Pesticide and Plant Pest Management Division



P.O. Box 30017

Lansing, MI 48909

517-284-5638/800-292-3939

***Our mission*** is to protect human health and the environment while fostering a diverse, viable Michigan agriculture.

**From:** Hansen, Michael (MDARD)  
**Sent:** Wednesday, March 22, 2017 10:19 PM  
**To:** Jones, Margaret <[jones.margaret@epa.gov](mailto:jones.margaret@epa.gov)>  
**Cc:** Stoliecki, Michael (MDARD) <[StolieckiM1@michigan.gov](mailto:StolieckiM1@michigan.gov)>; Zimmer, Jeffrey (MDARD) <[zimmerj@michigan.gov](mailto:zimmerj@michigan.gov)>  
**Subject:** RE: Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Thank you Margaret,

I'm copying this to Mike Stoliecki, Next time you are in Michigan be sure to introduce yourself to Mike, he's our new Pesticide Section Manager in the Lansing office.

Mike Hansen

**From:** Jones, Margaret [<mailto:jones.margaret@epa.gov>]  
**Sent:** Wednesday, March 22, 2017 2:44 PM  
**To:** Lori Bowman <[Lori.Bowman@Wisconsin.gov](mailto:Lori.Bowman@Wisconsin.gov)>; Frank, Scott <[Scott.Frank@Illinois.gov](mailto:Scott.Frank@Illinois.gov)>; [scottde@purdue.edu](mailto:scottde@purdue.edu); [beal@agri.ohio.gov](mailto:beal@agri.ohio.gov); [kimberly.middendorf@state.mn.us](mailto:kimberly.middendorf@state.mn.us); King, Gary (MDARD) <[kingg1@michigan.gov](mailto:kingg1@michigan.gov)>; Hansen, Michael (MDARD) <[hansenmg@michigan.gov](mailto:hansenmg@michigan.gov)>  
**Cc:** McDonald, Holly <[mcdonald.holly@epa.gov](mailto:mcdonald.holly@epa.gov)>; Baumgartner, Donald <[baumgartner.donald@epa.gov](mailto:baumgartner.donald@epa.gov)>; Wilkinson, Bruce <[wilkinson.bruce@epa.gov](mailto:wilkinson.bruce@epa.gov)>; Rittenhouse, Susan <[Rittenhouse.Susan@epa.gov](mailto:Rittenhouse.Susan@epa.gov)>; Dibblee, Seth <[Dibblee.Seth@epa.gov](mailto:Dibblee.Seth@epa.gov)>; Mysz, Amy <[mysz.amy@epa.gov](mailto:mysz.amy@epa.gov)>; Chou, Shem <[Chou.Shem@epa.gov](mailto:Chou.Shem@epa.gov)>; Calvo, Estrella <[calvo.estrella@epa.gov](mailto:calvo.estrella@epa.gov)>; Star, David <[star.david@epa.gov](mailto:star.david@epa.gov)>; Klevs, Mardi <[klevs.mardi@epa.gov](mailto:klevs.mardi@epa.gov)>

**Subject:** Listing for Rusty Patched Bumble Bee became effective on March 21, 2017

Hello,

US FWS is working on a Recovery Plan, which may provide some additional guidance.

<https://www.fws.gov/midwest/endangered/insects/rpbb/>

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Margaret L. Jones

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US EPA Region 5

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LC-17J

Chicago, IL 60604

312.353.5790 (phone)

312.408.2211 (fax)

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